



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

August 24, 2021

TRANSMITTED ELECTRONICALLY

Mr. Harold DeStefanis
4310 Sir Robert Avenue
North Royalton, Ohio 44133

RE: ScrapCom
Assessment
Correspondence
RCRA C - Hazardous Waste
Cuyahoga County
OHD980681571

Hazardous Waste Program - DERR

Subject: RCRA Corrective Action Remedy Construction Complete (CA550RC) and Corrective Action Performance Standards Attained-Controls Required (CA900CR), ScrapCom, OHD980681571

Dear Mr. DeStefanis:

ScrapCom (Facility), located at 3301 Monroe Ave. in Cleveland, Ohio, is subject to Corrective Action (CA) because a past tenant, North East Chemical Corporation (NECC), operated as a Treatment, Storage, and Disposal Facility (TSDF). CA is a comprehensive, site-wide cleanup program designed to evaluate and, when necessary, remediate releases of hazardous waste or hazardous waste constituents from waste management units at permitted or non-permitted TSDFs. The task of CA is to investigate and to remediate any contamination to the extent necessary to be protective of human health and the environment.

U.S. EPA uses Environmental Indicators (EI) to gauge a facility's progress with CA. This letter is to communicate that ScrapCom has achieved EIs CA550RC and CA900CR.

The "CA550RC - Remedy Constructed" event code indicates that remedy construction activities have been completed at the facility and the "CA900CR, Performance Standard Attained – Controls Required" event code indicates that the remedies selected for the protection of human health and the environment have been fully implemented and associated performance standards have been attained at the entire facility or specific areas within the facility.

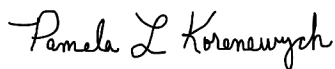
On March 17, 2021, Partners Environmental Inc., on behalf of ScrapCom Real Estate Holdings Ohio LTD, submitted to the Ohio Environmental Protection Agency (Ohio EPA) a Closure Certification Report dated March 16, 2021 and a Post-Closure Plan (PCP) dated March 2, 2021 for the former NECC located at 3301 Monroe Avenue, Cleveland, Ohio. Final closure acknowledgement and PCP approval were provided by Ohio EPA in a letter dated June 21, 2021.

Ohio EPA has determined that, with the acknowledgement of final closure and the approval of the PCP, that the remedy construction is complete and the CA Performance Standards have been attained, with controls required, for this Facility. Enclosed is the CA Completion Summary and Documentation of CA550RC and CA900CR. Ohio EPA will periodically evaluate whether the performance standard is being achieved through communication with the Facility, periodic inspections, and review of technical reports and other documentation.

This letter is an official response from Ohio EPA that will be maintained as a public record.

Should you have any questions, please contact me at (330) 963-1237, or via email at Pam.Korenewych@epa.ohio.gov.

Sincerely,



Pamela L. Korenewych
Site Coordinator
Division of Environmental Response and Revitalization

PK/sc

Attachments: Corrective Action Completion Summary
Documentation of CA550RC and CA900CR

ec: Erik Hagen, Manager, Ohio EPA, CO, DERR
Natalie Oryshkewych, Manager, Ohio EPA, NEDO, DERR
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**Corrective Action Completion Summary
Documentation of CA550RC and CA900CR
ScrapCom (formerly Brandon Partners aka North East Chemical)
3301 Monroe Avenue, Cleveland, Ohio
Cuyahoga County, Ohio
OHD980681571**

Introduction

The Corrective Action CA550RC - Remedy Constructed event code indicates that the remedy construction activities have been completed at the facility and the Corrective Action CA900CR, Performance Standard Attained – Controls Required event code indicates that remedies selected for the protection of human health and the environment have been fully implemented and associated performance standards have been attained¹ at the entire facility or specific areas within the facility.

The Ohio Environmental Protection Agency (Ohio EPA), as the authorized agency that implements the Resource Conservation and Recovery Act (RCRA) Corrective Action program for Ohio², evaluated ScrapCom (Facility), located at 3301 Monroe Avenue in Cleveland, Ohio, for attainment of event CA550RC and event CA900CR.

The Facility is located at the southeast corner of the intersection of Monroe Avenue and Fulton Road and encompasses approximately 7.6-acres in a mixed commercial/residential area. The Facility consists of two tax parcels identified as Permanent Parcel Numbers 00714002 and 00714003 in Cuyahoga County records. Buildings on-site occupy a total land area of ~148,946 square feet and include a former laboratory and office complex (vacant), a large warehouse currently used for storage of scrap metal and materials, a loading and unloading dock, maintenance building, and several buildings that have been razed with the foundations remaining. This list is not all inclusive. Lake Erie is approximately one mile to the north and the Cuyahoga River is one mile to the east. There is a cemetery directly east of the Facility and another to the west, across Fulton Road. To the south, is a rail line. Across Monroe Avenue to the north are residential dwellings. See Figures 1 and 2.

The Facility is subject to RCRA Corrective Action (CA) because a past tenant at the Facility operated as a RCRA Treatment, Storage, and Disposal Facility (TSDF). The property is also listed on U.S. EPA's RCRA 2020 CA Baseline.

In 1992, Metcalf and Eddy, Inc. conducted a Preliminary Assessment/Visual Site Inspection (PA/VS) on behalf of U.S. EPA to determine if any release of hazardous waste had occurred. The PA/VS indicated the facility ranked relatively low on the U.S. EPA's National Priority List for facilities with known releases or threatened releases of hazardous substances, pollutants, or contaminants.

¹ "Performance Standards Attained" is met when the remedies that were selected for the protection of human health and the environment are fully implemented. Cleanup levels must be attained. This goal may be reached with or without controls in place or additional long-term stewardship actions in place to be sure human health and the environment remain protected in perpetuity.

² The United States Environmental Protection Agency authorized the state of Ohio to implement the RCRA Corrective Action program in 1996.

Facility History:

As provided in the "Description of Facility" section of an Amended Closure Plan, dated November 11, 2009, and approved on May 28, 2010, the property was originally developed in 1936 for Dobeckmun Company, a cellophane products manufacturer. Dobeckmun Company, followed by Dow Chemical Company, also a cellophane products manufacturer, occupied the facility from the 1930s to the 1970s. In the mid to late 1970s, the facility was occupied by American Can Company, a manufacturer of plastic bags and Saran Wrap™. According to the Cuyahoga County Fiscal Officer website, <https://fiscalofficer.cuyahogacounty.us/en-US/REPI.aspx>, BBP, Inc. acquired the property from American Can Company on June 25, 1980. Brandon Partners (Brandon) acquired the property from BBP, Inc. on April 18, 1983. On December 11, 2018, ScrapCom Real Estate Holdings Ohio LTD (ScrapCom) purchased the property from Brandon.

From 1983 to 1999, North East Chemical Corporation (NECC) leased the property and structures from Brandon and operated as a hazardous waste storage and fuel blending facility, or TSDF. Brandon and NECC applied for but were unsuccessful in obtaining an Ohio hazardous waste installation and operation permit (permit). The Ohio EPA Director's Final Findings and Orders dated March 23, 1994, state that in 1985, U.S. EPA acknowledged NECC's Part A application and permitted the facility to operate under Interim Status. The 1994 Orders also exempted NECC from the requirement to obtain a permit pursuant to ORC § 3734.02(G).

NECC's activities included hazardous and non-hazardous waste fuel blending; hazardous and non-hazardous waste management and brokering; and solvent recovery. NECC operations included both underground storage tanks (USTs) and above ground storage tanks (ASTs) used in storage and blending of hazardous and non-hazardous materials. The ASTs were constructed inside buildings and within concrete containment structures. Operations prior to NECC utilized USTs in the southeast corner of the property; some of which were involved in a fire in 1964 that also consumed 350 metal drums containing solvents, adhesives, and inks.

In 1999, NECC declared bankruptcy and subsequently vacated the property.

RCRA Investigations and Closure:

In September 2000, Ohio EPA conducted a soil and ground water investigation as part of a RCRA Corrective Action investigation and produced the report, *Soil and Groundwater Investigation at North East Chemical Corporation, RCRA Corrective Action Investigation*, dated February 1, 2001. The results of the investigation reported elevated levels of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals.

A Closure Plan was submitted to the Agency in 2000, subsequently revised, and approved on May 9, 2001. In 2001, Environmental Design Group was contracted by Brandon to perform activities associated with RCRA closure of the HWMUs operated by NECC. The activities included removal of all waste and equipment, decontamination of wall and floor surfaces associated with the HWMUs, decontamination rinsewater sampling, and soil sampling in areas associated with the HWMUs.

An Amended Closure Plan was submitted in 2008 and revisions to the amended plan were submitted in 2009 and 2010. The Amended Closure Plan was approved May 28, 2010.

Seven HWMUs were identified requiring RCRA Closure.

HWMU	Area Designation	Use	Approximate Area
1	Plant #1	Container storage area	7,000 square feet
2	Plant #2	Container storage area	34,000 square feet
3	Waste Processing Area	Plant #1 waste processing area, including underground spill tank	6,000 square feet
4	Truck Pad	Truck loading pad	2,000 square feet
5	Bays	Bays in loading dock	3,000 square feet
6	Loading Dock	West side loading docks and drum staging area	3,500 square feet
7	Diked Area	South side tank farm	2,000 square feet

In addition to the above HWMUs, there are six Solid Waste Management Units (SWMUs). SWMU #1: Former East Warehouse; SWMU #2: Former Laboratory; SWMU #3: Former Adhesive Storage; SWMU #4: Former Outdoor Drum Storage; SWMU #5: Former Underground Storage Tank Area; SWMU #6: Former 10,000-gallon underground tank located partially beneath HWMU #3.

See Figure 3 for a map showing the HWMUs, and locations of historic operations.
See Figure 4 for HWMU and SWMU locations.

In 2013, Getco, Inc. sampled soils and ground water. Findings are reported in *RCRA Closure Subsurface Investigation Report Tasks VIII, IX, and X*, dated November 7, 2013. Exceedances of U.S. EPA Regional Screening Levels (RSLs) for industrial soil for arsenic, cadmium, chromium, lead, ethylbenzene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene in various soil borings were noted. Exceedances of Maximum Contaminant Levels (MCLs) in ground water in monitoring well MW-8 (located between HWMU 3 and SWMU 2) for ethylbenzene, toluene, and xylenes were also noted.

In 2016, a vapor intrusion screening was performed to evaluate environmental concerns of Chemicals of Concern (COC) reaching the residential properties to the north of the facility via ground water and becoming aerosolized for inhalation in the basement areas of the residences. Results are provided in the report, *Vapor Intrusion Screening at North East Chemical Corporation, Getco, Inc.*, April 19, 2016. In summary, three locations along the northern boundary were sampled for soil, ground water and vapor. In soils, analytical results for VOCs and SVOCs were all below detection limits, i.e., reporting limits. Arsenic, barium, and chromium were detected in all three locations, with one location having arsenic at 7.61 mg/kg above the residential use standard of 6.7 mg/kg. In ground water, analytical results for VOCs and SVOCs were all below detection limits, i.e., reporting limits. Arsenic, chromium, and lead were detected above respective MCLs in all three MWs. Barium was also detected above its MCL in one MW. For air vapor, 1,2,4-trimethylbenzene was detected in two MWs at 9.6 ug/m³, and 12 ug/m³ above the site-specific target level (SSTL) of 2.69 ug/m³ for Resident Child, and in one MW at 15 ug/m³ which is also above the SSTL of 12.6 ug/m³ for Resident Adult. In one MW, 1,3,5-trimethylbenzene was detected at 3.4 ug/m³ above the SSTL of 2.68 ug/m³ for Resident Child. Hexane was detected at 90 ug/m³ in one MW above the SSTL of 89.4 ug/m³ for Resident Child.

Total xylenes (m-xylene, p-xylene, o-xylene) were detected in all three MWs at 70 ug/m³, 70 ug/m³, and 95 ug/m³ above the SSTL of 44.7 ug/m³ for Resident Child.

From July 10 – July 14, 2017, Ohio EPA's Site Investigation Field Unit (SIFU) conducted a site-wide soil, ground water and soil vapor investigation of the facility. The results are provided in *2017 SIFU Site Assessment Report, Former North East Chemical Corporation (NECC), 218-001622*, September 18, 2017.

In summary:

- There was no evidence of soil vapor contamination along the northern boundary of the property.
- Soil gas contamination was identified in the southeast corner (SG4-19): 1,1-dichloroethane; 1,2-dichloroethane; trichloroethene; and vinyl chloride were detected above their respective commercial U.S. EPA Vapor Intrusion Screening Levels.
- Ethylbenzene and toluene were detected above their respective MCLs in MW-8, located in the roadway (alley) east of the former Plant 1 process building.
- Surface soil contamination exceeding U.S. EPA Industrial RSLs was identified at the following locations:
 - Outside of the buildings on the west side of the plant (SB-14, 0-2'): benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, chromium, lead.
 - Southwest corner of property (SB15, 0-2'): arsenic, chromium.
 - Outside the building on the south side (SB-16, 1-2'): benzo(a)pyrene, chromium.
 - Southeast corner of property (SB-17, 0-2'): chromium, lead.
 - Southeast corner of building (SB-21, 0-2') by loading docks: benzo(a)pyrene.

In 2019, Partners summarized the previous investigation findings from 2000 through 2017. The spreadsheets are attached to *Memo to Ohio EPA, RE: Summary of Previous Findings and Status, 3301 Monroe Avenue, Cleveland, Ohio – OHD 980681571*, Partners Environmental, Safety, Engineering & Surveying, dated June 4, 2019 (June 2019 Memo).

In August 2019, Partners Environmental, Safety, Engineering & Surveying (Partners) on behalf of ScrapCom, submitted to Ohio EPA a Class 1 Modification Amendment to the Closure Plan. The Amendment included descriptions of three SWMUs that were determined to require further assessment, a Work Plan for Supplemental Assessment of SWMUs #4, #5, and #6, and a Schedule for Closure. The Class 1 Modification Amendment was included as a Finding in the Final Director's Findings and Orders, effective October 30, 2019.

In 2020, Partners sampled soils and ground water as specified in the work plan noted in the October 30, 2019 Orders. Analytical results showed no concentrations of COCs in soil or ground

water exceeding applicable standards, except for tetrachloroethene in monitoring well PMW-24 at a concentration of 16.2 ug/L, above the MCL of 5 ug/L. A multiple chemical adjustment evaluation showed no cumulative risks exceeding standards for direct contact with soil, vapor intrusion, or tap water.

The Closure Plan was last amended on October 2, 2020 to revise the closure schedule, *cap areas where standards were exceeded in soil, abandon monitoring wells, revise closure cost estimates, and remove a reference to clean closure. (*It is noted that the amendment proposal clarified that concrete caps already exist for HWMUs #1, #2, #3, #4, #5, #6, #7 and SWMU #3. The closure activity involved replacing the portion of concrete partially within HWMU #3, where an underground storage tank was removed in 2017. This area is referred to as SWMU #6.)

RCRA Closure Certification and Post-Closure:

Acknowledgement of the final Closure Certification Report dated March 16, 2021, and approval of the Post-Closure Plan (PCP) dated March 2, 2021 were provided by Ohio EPA in a letter dated June 21, 2021.

Remedy Implementation:

1. **HWMU #1: Plant #1**

Soils beneath the concrete floor of HWMU #1 showed exceedances of benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cd)pyrene, arsenic, chromium, and lead. The existing concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.

2. **HWMU #2: Plant #2**

Soils beneath the concrete floor of HWMU #2 showed exceedances of benzo(a)pyrene. The existing concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.

3. **HWMU #3: Waste Processing Area (aka Plant 1 Process Room)**

Soils beneath the concrete floor of HWMU #3 showed exceedances of benzo(a)pyrene, arsenic, cadmium, chromium, lead, ethylbenzene, and xylenes. The remaining concrete floor and new concrete over the area where the 10,000-gallon UST was removed (SWMU #6) serve as a hard cover cap and will be inspected annually as required by the approved PCP.

4. **HWMU #4: Former Truck Pad**

Soils beneath the concrete floor of HWMU #4 showed exceedances of benzo(a)pyrene, arsenic, chromium, and lead. The existing concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.

B14 is shown in Figure 2 of the June 2019 Memo to Ohio EPA to be located west and slightly outside of the boundary for HWMU #4. In 2013, lead was found in soils at B14 at 1,260 mg/kg at 4-6 ft, exceeding the RSL of 800 mg/kg. The pavement for HWMU #4 does extend to cover where B14 was located.

5. HWMU #5: Bays
Soils beneath the concrete floor of HWMU #5 showed exceedances of benzo(a)pyrene, arsenic, and chromium. The existing concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.
6. HWMU #6: Loading Dock
Soils beneath the concrete floor of HWMU #6 showed exceedances of benzo(a)pyrene. The concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.
7. HWMU #7: Diked Area
Soils beneath the concrete floor of HWMU #7 showed exceedances of lead and chromium. The concrete floor serves as a hard cover cap and will be inspected annually as required by the approved PCP.
8. SWMU #1: Former east warehouse
Past testing found no exceedances for soil, soil gas, or ground water. No remedy needed for this area.
9. SWMU #2: Former laboratory
This area had concrete floors and no spills were reported or evidence of spills observed in the PA/VSIs. No sampling has been needed and no remedy is needed in this area.
10. SWMU #3: Former Adhesive Storage
Soils beneath the pavement in SWMU #3 showed exceedances of chromium, lead, benzo(a)pyrene and other polycyclic aromatic hydrocarbons (PAHs). This pavement will be inspected annually as required by the approved PCP.
11. SWMU #4: Former Outdoor Drum Storage
The area is found in the southeast corner of the property. Soil and ground water sampling were conducted in 2000 by Ohio EPA. Analytical results showed no exceedance of metals or VOCs and one soil sample (GB-2, 16 ft) had an exceedance of benzo(a)pyrene. Ground water results showed no MCL exceedances of VOCs. In 2019, soil samples from nine soil borings showed low level detections of VOCs and PAHs, well below U.S. EPA RSLs for industrial soils. Ground water samples from two MWs showed low concentrations of chlorinated compounds well below U.S. EPA Vapor Intrusion Screening Levels (VISLs), RSLs for tap water and MCLs. Multiple chemical adjustments showed no cumulative risks exceeding standards for direct contact with soil, vapor intrusion, or tap water. No remedy is needed for this area.
12. SWMU #5: Former UST Area
This area is found south of SWMU #4 in the southeast corner of the property. Soil and ground water sampling were conducted in this area in 2000 by Ohio EPA. Analytical results showed no exceedance of metals or VOCs and one soil sample (GB-2, 16 ft) had an exceedance of benzo(a)pyrene. In 2019, soil samples from nine soil borings showed low level detections well below the U.S. EPA RSLs for industrial soils. Ground water from three MWs showed low concentrations of chlorinated compounds well below U.S. EPA VISLs, RSLs for tap water and MCLs. Multiple chemical adjustments showed no cumulative risks

exceeding standards for direct contact with soil, vapor intrusion, or tap water. No remedy is needed for this area.

13. SWMU #6: Former 10,000-gallon UST

The UST was removed in 2017. Previous investigations in the vicinity of the UST were completed in 2013 by Getco, Inc. and in 2017 by Ohio EPA which found ground water impacts by petroleum compounds. In 2019, two MWs were installed and sampled. Results of ground water analyses showed low concentrations of several petroleum and chlorinated compounds below U.S. EPA VISLs, RSLs for tap water, and MCLs with the exception of tetrachloroethene (16.2 ug/L) in PMW-24. Multiple chemical adjustments show no cumulative risks exceeding standards for direct contact with soil, vapor intrusion, or tap water. PMW-24 will be monitored quarterly for VOCs under post-closure care.

14. Other areas not within any HWMU or SWMU:

- a. Soil borings SB15, SB16 and SB17 were not located within any HWMU or SWMU. SB15 was in the southwest corner of the property. SB16 was near the middle of the southern boundary of the property. SB17 was west and outside of the boundary for SWMU #5.

In 2017, soils from SB15, SB16 and SB17 were sampled. The following table summarizes the results and provides the respective RSL for industrial soils.

	SB15 (0-2 ft)	SB16 (1-2 ft)	SB17 (0-2 ft)	RSL for Industrial Soils
Arsenic	74 mg/kg	---	---	30 mg/kg
Chromium	790 mg/kg	530 mg/kg	860 mg/kg	63 mg/kg
Lead	---	---	3,000 mg/kg	800 mg/kg
Benzo(a)pyrene	---	3,700 ug/kg	---	21 mg/kg

The remedy for soils exceeding respective RSLs near the southeast corner, southern boundary, and southwest corner is the inclusion of a Risk Mitigation Plan (RMP) in the PCP. The RMP area includes the entire property and applies to arsenic, cadmium, chromium, lead, and benzo(a)pyrene in soils via direct contact.

- b. In 2017, 1,1-dichloroethene (6,700 ug/m³), 1,2-dichloroethane (284 ug/m³), trichloroethene (785 ug/m³) and vinyl chloride (3,020 ug/m³) were found above respective response action levels at soil gas sample location SG4, located near SB17. The remedy is inclusion of an institutional control (IC) within the PCP that places a limitation on building occupancy in a delineated area on the southern portion of the property, whereby, prior to any human occupancy of future buildings, a remedy that eliminates potential indoor air vapor intrusion exposure shall be installed and maintained as an engineering control. Alternatively, a demonstration may be made that the property complies with applicable standards for the vapor intrusion to indoor air exposure pathway without further implementation of remedial activity. A survey of the area is included as Appendix A in the PCP and delineated as an area within 100-feet of the soil gas exceedance at SG-4. See Figure 5 for map showing the building limitation area.

- c. To address the few past ground water samples that were found to exceed MCLs or RSLs, another IC in the PCP is a ground water use restriction. Ground water is not to be extracted or used for any purpose, except in conjunction with construction or excavation activities, maintenance of subsurface utilities, or ground water monitoring, as necessary. If ground water is encountered during construction or excavation activities, such water will be directed to a Publicly Owned Treatment Works (POTW), upon approval from the POTW.

To address tetrachloroethene found in monitoring well PMW-24 at a concentration of 16.2 ug/L, above the MCL of 5 ug/L during the 2020 sampling, PMW-24 will be sampled quarterly in the PCP.

References:

Preliminary Assessment / Visual Site Inspection (PA/VS), Metcalf & Eddy, March 1992; Ingested into Ohio EPA's e-Document system as document # 691317

Soil and Groundwater Investigation at North East Chemical Corporation, RCRA Corrective Action Investigation, Ohio EPA, February 1, 2001. Document located at the Ohio EPA's Northeast District Office

Amended Closure Plan, North East Chemical Corporation, November 11, 2009 with cover letter dated February 26, 2010; Ingested into Ohio EPA's e-Document system as document # 810146

RCRA Closure Subsurface Investigation Report Tasks VIII, IX, and X, November 7, 2013; Ingested into Ohio EPA's e-Document system under document # 259685

Vapor Intrusion Screening at North East Chemical Corporation, Getco, Inc., April 19, 2016; Ingested into Ohio EPA's e-Document system under document # 469731

2017 SIFU Site Assessment Report, Former North East Chemical Corporation (NECC), 218-001622, September 18, 2017, Ohio EPA; Ingested into Ohio EPA's e-Document system under document # 694242

Memo to Ohio EPA, RE: Summary of Previous Findings and Status, 3301 Monroe Avenue, Cleveland, Ohio – OHD 980681571, Partners Environmental, Safety, Engineering & Surveying, June 4, 2019, Ingested into Ohio EPA's e-Document system under document # 1593939

Supplemental Assessment Report, Partners Environmental, Safety, Engineering & Surveying, March 18, 2020; Ingested into Ohio EPA's e-Document system under document #1334618

Class 1A Amendment to Closure Plan, June 12, 2020; Ingested into Ohio EPA's e-Document system under document # 1370010

Post-Closure Plan, March 2, 2021; Ingested into Ohio EPA's e-Document system under document # 1535733

Figures:

Figure 1: Property Location Map – taken from Post-Closure Plan

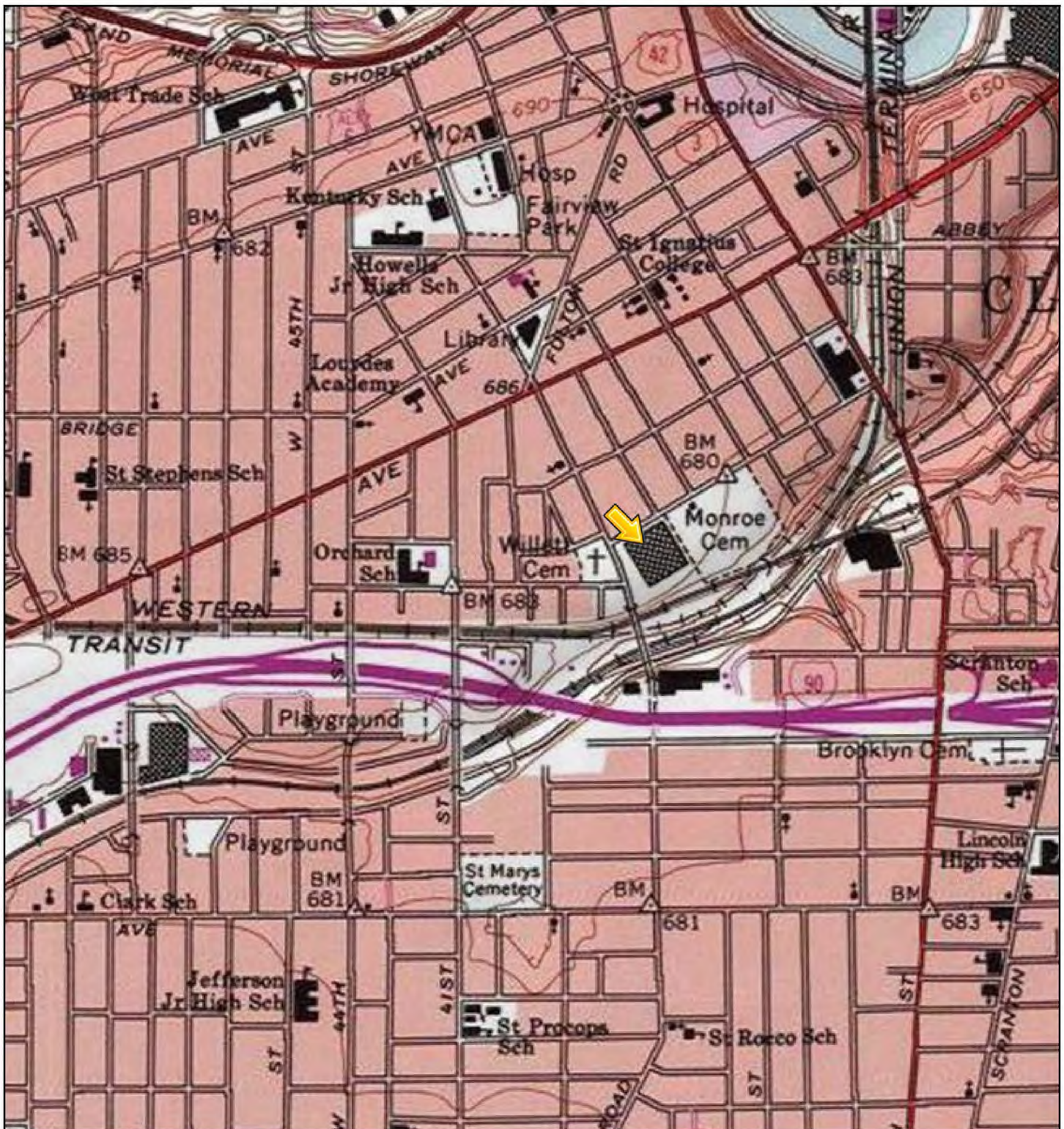
Figure 2: Property and Surrounding Area – taken from Post-Closure Plan

Figure 3: Map showing the HWMUs, and locations of historic operations
– taken from 2009 Closure Plan

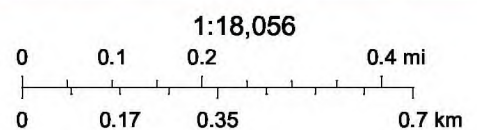
Figure 4: HWMU and SWMU Locations – taken from Post-Closure Plan

Figure 5: Map showing building limitation area – taken from Post-Closure
Plan

Figure 1: Property Location Map



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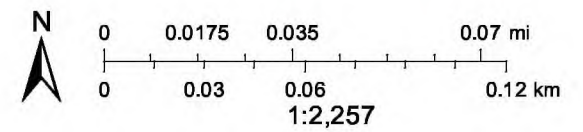


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Figure 2 - Property and Surrounding Area



December 6, 2019



[illegible]

FIGURE 3. HAZARDOUS WASTE MANAGEMENT UNITS
AMENDED RCRA CLOSURE PLAN
3301 MONROE AVENUE
CLEVELAND, OHIO
CUYAHOGA COUNTY

